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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

RE:  McCLAIN FEED YEARD, INC., McCLAIN FARMS, INC., AND 7M CATTLE FEEDERS, INC.,  <i>Debtors.</i> <sup>1</sup>	Chapter 7  CASE NO. 23-20084-rlj  Jointly Administered
RABO AGRIFINANCE LLC,  <i>Plaintiff,</i>  v.	<b>ADV. PROC. NO. 23-02005-rlj</b>  <b>Honorable Robert L. Jones</b>
ACEY LIVESTOCK, LLC, <i>et al.</i>  <i>Defendants.</i>	

**JOINDER AND RESERVATION OF RIGHTS OF DEFENDANT ANGIE ROBINSON TO RABO AGRIFINANCE, LLC'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

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<sup>1</sup> The Debtors in these jointly administered cases are: (1) McClain Feed Yard, Inc. (Case No. 23-20084); (2) McClain Farms, Inc. (Case No. 23-20885); and (3) 7M Cattle Feeders, Inc. (Case No. 23-20886). All three cases are being jointly administered under the case number for McClain Feed Yard, Inc.

COMES NOW Angie Robinson (“Robinson”), a defendant in this adversary proceeding, and files this joinder and reservation of rights (“Joinder”) regarding Rabo AgriFinance, LLC’s *Motion for Partial Summary Judgment* (Dkt. No. 190) (“Motion”), and in support thereof would show to the Court the following:

1. Rabo AgriFinance, LLC’s (“Rabo”) Motion seeks partial summary judgment as to Rabo’s second cause of action pled in its *Amended Complaint for Declaratory Relief* (“Amended Complaint”) (Dkt. No. 3), and seeks, among other things, the following declaratory relief:

- a. The Non-Valid Claims are neither valid nor payable under the Dealer Trust Statute;
- b. The Non-Valid Claimants are not entitled to any funds subject to the Dealer Trust Statute.

2. Robinson joins in all things with the *Response to Rabo AgriFinance LLCs Motion for Partial Summary Judgment* filed by Thorlakson Diamond T Feeders, LLC (Dkt. No. 201) and the *Cattle Owner Defendants’ Response to Motion for Partial Summary Judgment* filed by the Cattle Owner Defendants (Dkt. No. 205) (collectively, the “Responses”), which were filed by similarly situated defendants regarding the Motion, including the arguments, evidence and legal authorities of the Responses which are incorporated by reference into this Joinder.

3. Robinson expressly reserves the right to update, supplement, and/or amend this Joinder. Robinson further preserves the right to raise any other such arguments, evidence and legal authorities or to join in any other response to the Motion by any party.

WHEREFORE, Defendant Angie Robinson respectfully prays that the Court deny the Motion, and grant Robinson such other and further relief to which she is entitled at law or in equity.

Respectfully submitted

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By: /s/ Todd J. Johnston  
Todd J. Johnston

***ATTORNEYS FOR DEFENDANT***  
***ANGELA ROBINSON***

**CERTIFICATE OF SERVICE**

I hereby certify that on October 28, 2024, the foregoing document was served on all parties entitled to service via the Court's CM/ECF system.

/s/ Todd J. Johnston  
Todd J. Johnston